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Oracle International Corporation,  
Oracle America, Incorporated,  
and Oracle Corporation*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, *as assignee of  
individuals who are Covered Persons*,  
JANE DOE-1, *a law enforcement  
officer*, JANE DOE-2, *a law  
enforcement officer*, EDWIN  
MALDONADO, SCOTT MALONEY,  
JUSTYNA MALONEY, PATRICK  
COLLIGAN, PETER ANDREYEV,  
and WILLIAM SULLIVAN,

Plaintiffs,

v.

ORACLE INTERNATIONAL  
CORPORATION, ORACLE  
AMERICA, INC., ORACLE CORP.,  
RICHARD ROES 1-10, *fictitious  
names of unknown individuals* and  
ABC COMPANIES 1-10, *fictitious  
names of unknown entities*,

Defendants.

CASE NO. 2:24-cv-04112-JXN-CLW

District Judge Julien Xavier Neals

Magistrate Judge Cathy L. Waldor

**APPLICATION FOR CLERK’S ORDER EXTENDING TIME  
PURSUANT TO LOCAL RULE 6.1(B)**

Application is hereby made for a Clerk’s Order, pursuant to L. Civ. R. 6.1(b), extending by 14 days the time within which Defendants Oracle International Corporation, Oracle America, Incorporated, and Oracle Corporation (together, “the Oracle entities”) may answer, move, or otherwise respond to the Complaint filed by Plaintiffs herein. It is represented that:

1. The Oracle entities removed this action to this Court on March 22, 2024.
2. Pursuant to Fed. R. Civ. P. 81(c)(2), the Oracle entities’ time to answer, move, or otherwise respond to the Complaint currently expires on March 29, 2024.
3. The Oracle entities have not previously sought from this Court an extension of time to answer, move, or otherwise respond to the Complaint.
4. The Oracle entities respectfully request, pursuant to L. Civ. R. 6.1(b), a 14-day extension of time within which to answer, move, or otherwise respond to the Complaint, i.e., until April 12, 2024.

Dated: March 28, 2024

**LATHAM & WATKINS LLP**

/s/ Kevin M. McDonough

Kevin M. McDonough (ID:  
41892005)

Serrin Turner (*pro hac vice*  
*forthcoming*)

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*Attorneys for Defendants Oracle  
International Corporation,  
Oracle America, Incorporated,  
and Oracle Corporation*

**[PROPOSED] ORDER**

The application is GRANTED; the time within which Defendants Oracle International Corporation, Oracle America, Incorporated, and Oracle Corporation are required to answer, move, or otherwise respond to the Complaint is extended to April 12, 2024.

Dated: March \_\_\_, 2024

By: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2024, I electronically filed the foregoing by using the Court's CM/ECF system, and accordingly served all parties who receive notice of the filing via the Court's CM/ECF system.

/s/ Kevin M. McDonough

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